

### III. REMARKS

Claims 1-26 are pending in this application. By this amendment, claims 1, 7, 9, 12, 20 and 26 have been amended. Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

In the Office Action, claim 2 is rejected under 35 U.S.C. §112 as allegedly being indefinite. Claims 1-8 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Zhu *et al.* (U.S. Patent No. 6,691,154), hereafter "Zhu," in view of Isfeld *et al.* (U.S. Patent No. 5,483,640), hereafter "Isfeld," and further in view of Sarin *et al.* ("Computer-based real-time conferencing systems"), hereafter "Sarin." Claims 9-11 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Zhu in view of Isfeld and further in view of Thompson *et al.* (U.S. Patent Publication No. 5,483,640), hereafter "Thompson." Claims 12, 15-18, 20-22 and 24 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Paroz *et al.* (U.S. Patent No. 6,587,125), hereafter "Paroz." Claims 13-14 and 23 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Paroz in view of Isfeld. Claims 19, 25 and 26 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Paroz in view of Isfeld, Sarin and Thompson.

**A. REJECTION OF CLAIM 15 UNDER 35 U.S.C. §112**

The Office has asserted that claim 2 is indefinite for failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention. Specifically, the Office asserts that the limitation “the hardwired network” lacks antecedent basis. Applicants respectfully traverse the rejection and submit that the antecedent basis for “the hardwired network” of claim 2 lies in the limitation “a hardwired network” in line 3 of claim 1, from which claim 2 depends. Accordingly, Applicants request that the rejection be withdrawn.

**B. REJECTION OF CLAIMS 1-8 UNDER 35 U.S.C. §103(a) OVER ZHU IN VIEW OF ISFELD AND SARIN**

With regard to the 35 U.S.C. §103(a) rejection over Zhu in view of Isfeld and Sarin, Applicants assert that the combined features of the cited references do not teach each and every feature of the claimed invention. For example, with respect to claims 1 and 7, Applicants submit that, the combined references fail to teach or suggest that both the hardware and software layer of the console device can be accessed. Col. 4, line 26 through col. 5, line 20. Instead, the invention in Zhu allows a remote expert to edit a file or open an application on a local unattended server. However, Zhu does not teach that both the hardware and software layer can be accessed. Neither Isfeld nor Sarin cures this deficiency. In contrast, the claimed invention includes “...both the hardware and software layer of the console device can be accessed.” Claim 1. As such, in contrast to Zhu in which a remote expert can only edit a file or open an application, in the claimed invention both the hardware and software layer of the console device can be accessed. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

With further respect to independent claims 1 and 7, Applicants respectfully submit that the cited references also fail to teach or suggest accessing the console device on a peer to peer basis. In contrast, Zhu teaches against a peer to peer basis by citing advantages of using a client-server architecture rather than a peer-to-peer architecture. Col. 2, line 63 through col. 3, line 8. The Office attempts to get around this teaching by stating that the description of peer to peer in the specification does not follow the traditional definition used by one of ordinary skill in the art. However, the Office's position fails to recognize that the description in the specification includes the language "...management occurs as if a direct linked [sic] were formed from users to console device. As such, the direct link as included in the claimed invention integrates aspects of a typical peer to peer connection. Thus, the explanation of peer to peer in the specification does not abolish the typical meaning, but instead enhances it to meet the needs of the claimed invention. As stated above, these teachings, namely peer to peer architecture, are in opposition to the teachings of Zhu. Neither Isfeld nor Sarin removes this deficiency, and there would be no motivation to combine them with Zhu, which teaches against peer to peer, even if they did. Accordingly, Applicants request that the rejection be withdrawn.

With respect to dependent claims, Applicants herein incorporate the arguments presented above with respect to independent claims from which the claims depend. Furthermore, Applicants submit that all dependant claims are allowable based on their own distinct features. Since the cited art does not teach each and every feature of the claimed invention, Applicants respectfully request withdrawal of this rejection.

**C. REJECTION OF CLAIMS 9-11 UNDER 35 U.S.C. §103(a) OVER ZHU IN VIEW OF ISFELD AND THOMPSON**

With regard to the 35 U.S.C. §103(a) rejection over Zhu in view of Isfeld and Thompson, Applicants assert that the combined features of the cited references do not teach each and every feature of the claimed invention. For example, with respect to independent claim 9, Applicants submit that, as argued above with respect to claims 1 and 7, the combined references fail to teach or suggest that both the hardware and software layer of the console device can be accessed. With respect to independent claim 9, Applicants submit that, as argued above with respect to claims 1 and 7, the combined references fail to teach or suggest accessing the console device on a peer to peer basis. Thompson does not cure this deficiency. Accordingly, Applicants request that the rejections be withdrawn.

With respect to dependent claims, Applicants herein incorporate the arguments presented above with respect to independent claims from which the claims depend. Furthermore, Applicants submit that all dependant claims are allowable based on their own distinct features. Since the cited art does not teach each and every feature of the claimed invention, Applicants respectfully request withdrawal of this rejection.

**D. REJECTION OF CLAIMS 12, 15-18, 20-22 and 24 UNDER 35 U.S.C. §103(a) OVER PAROZ**

With regard to the 35 U.S.C. §103(a) rejection over Paroz, Applicants assert that the combined references cited by the Office fail to teach or suggest each and every feature of the claimed invention. For example, with respect to independent claims 12 and 20, Applicants respectfully submit that the combined references fail to teach or suggest that both the hardware

and software layer of the console device can be accessed. Specifically, Paroz teaches a method for remotely controlling a first computing device from at least one of a plurality of second computing devices. Abstract. However, nowhere does Paroz teach or suggest that the control includes both the hardware and software layer of the computing device. In contrast, the present invention provides "...both the hardware and software layer of the console device can be accessed." Claim 12. As such, rather than simply remotely controlling a first computing device as in Paroz, in the claimed invention both the hardware and software layer of the console device can be accessed. Accordingly, Applicants respectfully request that the Office's rejection be withdrawn.

With respect to dependent claims, Applicants herein incorporate the arguments presented above with respect to independent claims from which the claims depend. Furthermore, Applicants submit that all dependant claims are allowable based on their own distinct features. Since the cited art does not teach each and every feature of the claimed invention, Applicants respectfully request withdrawal of this rejection.

**E. REJECTION OF CLAIMS 13, 14 and 23 UNDER 35 U.S.C. §103(a) OVER PAROZ IN VIEW OF ISFELD**

With further regard to the 35 U.S.C. §103(a) rejection over Paroz in view of Isfeld, Applicants submit that the combined features of the cited art fail to teach each and every feature of the claimed invention. Specifically, with respect to dependent claims, Applicants herein incorporate the arguments presented above with respect to independent claims from which the claims depend. Furthermore, Applicants submit that all dependant claims are allowable based on

their own distinct features. Since the cited art does not teach each and every feature of the claimed invention, Applicants respectfully request withdrawal of this rejection.

**F. REJECTION OF CLAIMS 19, 25 and 26 UNDER 35 U.S.C. §103(a) OVER PAROZ IN VIEW OF ISFELD**

With further regard to the 35 U.S.C. §103(a) rejection over Paroz in view of Isfeld, Applicants submit that the combined features of the cited art fail to teach each and every feature of the claimed invention. For example, with respect to independent claim 26, Applicants submit that, as argued above with respect to claims 12 and 20, Paroz fails to teach or suggest that both the hardware and software layer of the console device can be accessed. Isfeld, Sarin and Thompson do not cure this deficiency. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

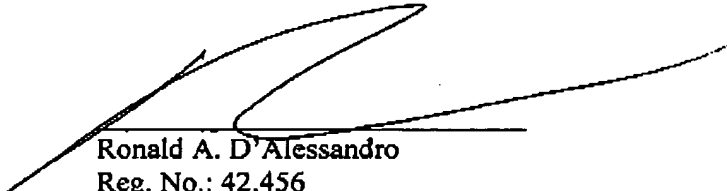
With regard to the Office's arguments regarding dependent claims, Applicants herein incorporate the arguments presented above with respect to independent claims listed above. In addition, Applicants submit that all dependant claims are allowable based on their own distinct features. However, for brevity, Applicants will forego addressing each of these rejections individually, but reserve the right to do so should it become necessary. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

#### IV. CONCLUSION

In light of the above, Applicants respectfully submit that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

Respectfully submitted,

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